

RE: GLORIA HUERTA

) Case No. 19 B 24132
)
Debtor) Chapter 13
)
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

GLORIA HUERTA

CUTLER & ASSOC
via Clerk's ECF noticing procedures

2271 S LEXINGTON DR #307
MOUNT PROSPECT, IL 60056

Please take notice that on November 13, 2019 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on October 21, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On August 27, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend Plan to provide for 5.25% interest to unsecured creditors due to equity in real estate.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,
/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
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